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August 29, 2025

Via ECF

Hon. Lewis J. Liman
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: United States v. LabQ Clinical Diagnostics, LLC, et al.,
22 Civ. 751, 22 Civ. 10313 (LJL)

Dear Judge Liman:

Our office is counsel for LabQ Clinical Diagnostics, LLC and Dart Medical Laboratory, Inc. We respectfully submit this letter on behalf of LabQ, Dart Medical, as well as Community Mobile Testing, Inc. and Moshe Landau in connection with the Government's Motion for Order to Show Cause Why Defendants Should Not Be Held in Contempt of the Court's Orders (the "Contempt Motion") (Dkt. No. 677) and the Government's Motion for Sanctions (the "Sanctions Motion") (Dkt. No. 700).

Specifically, it is respectfully requested that the Contempt Motion briefing schedule be modified as follows:

Submission	Current Due Date	Proposed Submission Date
Defendants' Opposition	August 29, 2025	September 2, 2025
Government's Reply	September 8, 2025	September 10, 2025
Court Hearing	September 19, 2025	September 19, 2025 (No change)

It is further requested that the Sanctions Motion briefing schedule be modified as follows:

Submission	Current Due Date	Proposed Submission Date
Defendants' Opposition	August 29, 2025	September 2, 2025
Government's Reply	September 2, 2025	September 10, 2025

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This is Defendants' second request for an extension of time in connection with the Contempt Motion, which was initially extended from August 27, 2025 to August 29, 2025. This is the first request for an extension of time to respond to the Sanctions Motion. Additional time is needed to respond to both motions due to Mr. Landau experiencing a death in his family that required him to travel overseas.

The Government provided the following statement to Defendants: "the Government takes no position on Defendants' extension request, but notes that this is Defendants' second extension request and that the Government does not consent to any request by Defendants for an adjournment of the hearing on this motion currently scheduled for September 19. If the Court grants Defendants' request, the Government respectfully requests that the Court set a deadline of September 10, 2025, for the Government's reply brief."

We thank the Court in advance for its consideration of this matter.

Respectfully submitted,

s/ Lee Vartan

Lee Vartan
Member